

From: [Hathaway, Margaret](#)
To: [Meadows, Sarah](#)
Subject: FW: Dicamba Monitoring Report
Date: Wednesday, September 16, 2020 11:51:43 AM
Attachments: [Audubon Arkansas Dicamba Monitoring Report.pdf](#)

From: Echeverria, Marietta <Echeverria.Marietta@epa.gov>
Sent: Friday, September 04, 2020 3:45 PM
To: Hathaway, Margaret <Hathaway.Margaret@epa.gov>; Kenny, Daniel <Kenny.Dan@epa.gov>
Cc: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Subject: FW: Dicamba Monitoring Report

Please make sure this gets stored in our tracker.

From: Messina, Edward <Messina.Edward@epa.gov>
Sent: Friday, September 4, 2020 12:56 PM
To: Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>
Subject: FW: Dicamba Monitoring Report

Fyi – Might be good to have a standard response for these. Will this be added to the docket?

Ed Messina, Esq.
Acting Office Director
Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency
Washington, D.C.
p: (703) 347-0209

From: Scheiman, Dan <Dan.Scheiman@audubon.org>
Sent: Friday, September 04, 2020 11:27 AM
To: Goodis, Michael <Goodis.Michael@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>
Subject: Dicamba Monitoring Report

Director Messina and Deputy Director Goodis,

In 2019 and 2020, Audubon Arkansas led a community science project to monitor and document dicamba herbicide damage to vegetation on public lands in order to gain a better understanding of the geographic range, extent, and severity of unintended damages. The full report is attached.

Audubon's data reveal that dicamba's off-target impact to plants is widespread in both geographic scope and number of species afflicted. Audubon staff and trained volunteers made 363 observations of apparent dicamba symptomology on a variety of plants across 20 eastern Arkansas counties. Plant species impacted, which included sycamore, oak, pawpaw, redbud, and trumpetvine, were growing on public lands such as university research farms, wildlife management areas, city parks, cemeteries, and many county and state roads. This includes three state natural areas that harbor the endangered species Pondberry and Red-cockaded Woodpecker. There are at least 30 instances where our observations occurred within two miles of where Plant Board inspectors collected plant tissue samples that tested positive for dicamba on dates that are after the May 25 cutoff. In fact, this year we observed 94 locations where pigweed had apparently been sprayed after the May 25 cutoff, as well as multiple soybean fields in multiple counties that were evenly cupped across the entire field.

Further, in reviewing the Arkansas State Plant Board's pesticide misuse case files I noted multiple complaints filed by homeowners because their trees and gardens show symptoms consistent with plant growth regulator herbicides. Yet inspectors cannot visually find a source of the spraying so no violation is found, the homeowner receives no compensation for the loss, and those who sprayed illegally get away with it. The same goes for farmers who submitted damage to their row crops or orchards. Dicamba's volatility cannot be traced, making enforcement highly problematic. Sensitive crops, yards, churchyards, cemeteries, and public natural areas deserve protection from chemical trespass. The EPA should give equal consideration to all of these stakeholders before registering any dicamba product.

Sincerely,

Dan Scheiman, Ph.D.
Bird Conservation Director
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